

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

BRENDAN McGUINNESS,

CIVIL ACTION NO. 05-11738-EFH

Plaintiff,

v.

JAMES R. BENDER,  
LOIS RUSSO,  
MICHAEL D. FARLEY,  
JASON J. OLIVER,  
DAVID M. SHAW,  
JUAN MEZA,  
JOHN A. BELAIR, and  
JOHN A. FLOWERS,

Defendants.

**MOTION TO FURTHER ENLARGE**

The defendants, by counsel, move that the time for responding to the plaintiff's motion for partial summary judgment be further enlarged up to and including **April 14, 2006**. As reason therefore, the defendants state that counsel requires additional time to research and respond to the factual and legal claims presented by this motion. The additional time is also required because of counsel's other litigation responsibilities, and because of the increasing number of cases assigned to this office.

Dated: April 10, 2006

Respectfully submitted,

NANCY ANKERS WHITE  
Special Asst. Attorney General

/s/ William D. Saltzman  
William D. Saltzman, BBO No. 439749  
Department of Correction Legal Division  
70 Franklin Street, Suite 600  
Boston, Massachusetts 02110  
(617) 727-3300, Ext. 154  
wdsaltzman@doc.state.ma.us

CERTIFICATE OF SERVICE

I hereby certify that this document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non registered participants on April 10, 2006.

Dated: April 10, 2006

/s/ William D. Saltzman  
William D. Saltzman